1	BELLON & MANINGO, LTD.
2	LANCE A. MANINGO, ESQ.
3	Nevada Bar No. 6405 732 S. Sixth Street, Suite 102
4	Las Vegas, Nevada 89101 Telephone: (702) 452-6299
5	Facsimile: (702) 452-6298
6	Email: lam@bellonandmaningo.com Attorney for Defendant
7	MARC BRATTIN
8	UNITED STATES DISTRICT COURT
9	DISTRICT OF NEVADA
10	THE UNITED STATES OF AMERICA,)
11) 2:13-cr-00161-APG-CWH Plaintiff,
12	j
13))
14	MARC BRATTIN,
15	Defendant.
16)
17	HNOPPOSED MOTION TO MODIEV TRAVEL DESTRICTIONS

UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS

Defendant, MARC BRATTIN, by and through his attorney, LANCE A. MANINGO, ESQ., of BELLON & MANINGO, LTD., moves this court for an Order to temporarily modify the travel restrictions placed on Mr. Brattin pursuant to the Order Setting Conditions of Release. ////

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This Motion is made and based upon the Points and Authorities herein and the papers and pleadings previously on file in this matter.

DATED this 24 day of February, 2014.

BELLON & MANINGO, LTD.

By:

LANCE A. MANINGO, ESQ.

Nevada Bar No. 6405

732 S. Sixth Street, Suite 102

Las Vegas, Nevada 89101

Attorney for Defendant

MARC BRATTIN

POINTS AND AUTHORITIES

- 1. The Defendant Marc Brattin desires to travel to Pittsburgh, Pennsylvania from March 5, 2014 through March 12, 2014 to attend his grandmother's 90th birthday celebration with his family.
- 2. On May 6, 2013, an Order Setting Conditions of Release was filed. In said Order, condition 8(g) requires that Mr. Brattin abide by the following restrictions on personal association, place of abode within the District of Nevada. Mr. Brattin has been in compliance with said Order.
- 3. Undersigned counsel contacted AUSA Sarah E. Griswold regarding the planned trip and asked if she was agreeable to making a slight modification to the travel restrictions placed on Mr. Brattin. Ms. Griswold indicated that she is not opposed to modifying the current travel restrictions to allow Mr. Brattin and his family to travel Pittsburgh, Pennsylvania from March 5, 2014 through March 12, 2014 to attend his grandmother's 90th birthday celebration with his family.

$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	4. After speaking with Ms. Griswold, undersigned counsel contacted Mr.
3	Brattin's Pretrial Services Officer – Officer Barlow, to inquire about her position regarding
4	the above modification. Officer Barlow stated that she too is agreeable to the travel
5	arrangements as long as all other conditions of release are met.
6	5. Counsel respectfully requests that this Court consider the above facts and
7	circumstances and order that the Condition of Release preventing Mr. Brattin from traveling
8	out of the State of Nevada be temporarily modified to allow Mr. Brattin to travel to
9	Pittsburgh, Pennsylvania from March 5, 2014 through March 12, 2014 to attend his
11	grandmother's 90 th birthday celebration with his family.
12	DATED this day of February, 2014.
13	BELLON & MANINGO, LTD.
14	
15	By: NANDE A MANDICO ESO
16	LANCE A. MANINGO, ESQ. Attorney for Petitioner

IT IS SO ORDERED.

DATED this 4th day of March, 2014.

MARC BRATTIN